UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

------ X Case No.

Document 67

SYLVIA MAYORGA,

1:22-CV-00387 (AMD) (RML)

Plaintiff,

- against -

JOINT STATUS REPORT

IRA GREENBERG, individually and in his official capacity, and THE NEW YORK STATE DIVISION OF HOMELAND SECURITY AND **EMERGENCY** SERVICES,

Defendants.

Pursuant to Magistrate Judge Robert M. Levy's directive on August 16, 2024, the Parties, by and through their respective undersigned counsels, submit this Joint Status Report as follows:

The parties attended a private mediation on October 1, 2024. At this time, the parties are in the process of obtaining the required consent from various State agencies for the potential resolution of plaintiff's claims. This process is lengthy and has caused a delay in confirming whether the parties have a settlement in principle.

As such, the parties respectfully request an additional 45 days (until on or about December 16, 2024, the first business day after the deadline) to coordinate the potential settlement terms for approval and signature. In addition, the parties respectfully request that discovery remain stayed pending this approval process.

We thank the Court for its time and attention to this matter.

Date: New York. New York

October 30, 2024

Respectfully submitted,

Porter Thomas Grabell & Baumwoll, P.C.

Attorneys for Defendant Ira Greenberg

Matthew Grabell

Wilson Elser Moskowitz Edelman & **Dicker LLP**

Attorneys for The New York State Division of Homeland Security and Emergency Services

By:

Arthur Porter

Matthew Grabell

David Baumwoll

560 Sylvan Avenue, 3rd Floor, Suite 3061

Nancy V. Wright

By:

Yusha D. Hiraman

150 E 42nd Street

New York, New York 10017

Englewood Cliffs, New Jersey 07632 <u>aporter@ptgb-law.com</u> <u>Mgrabell@ptgb-law.com</u> <u>dbaumwoll@ptgb-law.com</u> File No. Nancy.wright@wilsonelser.com Yusha.hiraman@wilsonelser.com File No. 24603.00001

Mark David Shirian P.C.

Attorneys for Sylvia Mayorga

Bv:

Mark D. Shirian Shawn Shirian

228 East 45th Street, Suite 1700-B

New York, New York 10017

mshirian@shirianpc.com sshirian@shirianpc.com